Distribution Integrity Management Program (DIMP)

Operator of Gas Distribution System

North Shore Gas

Operator ID: **13660**
Operator: **NORTH SHORE GAS CO**
Address: **3001 W. GRAND AVENUE, WAUKEGAN, IL 60085**
(312) 240-4713

Inspection ID: **32**
Report Date: **8/15/2014**
Inspection Date: **8/12/2014**
States(s) included in this Inspection:

Illinois

Agency Representatives:

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Persons Interviewed:

Glannie Chan, Supervisory Engineer, 2243602035, gachan@peoplesgasdelivery.com
Harsh Mehta, Associate Engineer, 3123601195, hbmehta@peoplesgasdelivery.com
Mark Kinzle, General Manager, MWKinzle@northshoregasdelivery.com
Steve Lipka, General Supervisor, slipka@northshoregasdelivery.com

Inspector Comments:

Q. No.:	Rule Name:	Question	Answer	Details	Comments
1	192.1005				
		Was the plan written and implemented per the requirement of 192.1005 by 08/02/2011?	Yes or Satisfactory	Staff reviewed the original plan issued on 8/2/2011.	
		OR			
		For a gas system put into service or acquired after 08/02/2011, was a plan written and implemented prior to beginning of operation?			
2	Information Only				
		Were commercially available product(s)/templates used in the development of the operator's written integrity management plan?	Yes or Satisfactory		
		Commercial product(s)/templates name if used:	Partially	SHRIMP and NSG designed a DIMP program to supplement SHRIMP.	
3	Information Only				

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Does the operator's plan assign responsibility, including titles and positions, of those accountable for developing and implementing required actions?	Yes or Satisfactory	The information is located in NSG Plan Section 4.0, Responsibility and Authority.	
4	192.1007(a)(1)	Do the written procedures identify or reference the appropriate sources used to determine the following characteristics necessary to assess the threats and risks to the integrity of the pipeline:			
		Design (e.g. type of construction, inserted pipe, rehabilitated pipe method, materials, sizes, dates of installation, mains and services, etc.)?	Yes or Satisfactory	The information is located in NSG DIMP plan Section 6.1, Sources Used to Assess Threats & Risks to Pipeline Integrity. An additional list of specific records used to meet this requirement are listed in NSG DIMP plan Appendix 1.	
		Operating Conditions (e.g. pressure, gas quality, etc.)?	Yes or Satisfactory	The information is located in NSG DIMP plan Section 6.1, Sources Used to Assess Threats & Risks to Pipeline Integrity. An additional list of specific records used to meet this requirement are listed in NSG DIMP plan Appendix 1.	
		Operating Environmental Factors (e.g. corrosive soil conditions, frost heave, land subsidence, landslides, washouts, snow damage, external heat sources, business districts, wall-to-wall paving, population density, difficult to evacuate facilities, valve placement, etc.)?	Yes or Satisfactory	The information is located in NSG DIMP plan Section 6.1, Sources Used to Assess Threats & Risks to Pipeline Integrity. An additional list of specific records used to meet this requirement are listed in NSG DIMP plan Appendix 1.	
5	192.1007(a)(2)				

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Do the written procedures require the consideration of information gained from past design, operations, and maintenance (e.g. O&M activities, field surveys, One-Call system information, excavation damage,	Yes or Satisfactory	The various records are listed in the NSG DIMP plan Appendix 1.	
6	Information Only				
		Do the written procedures indicate if the information was obtained from electronic records, paper records, or subject matter expert knowledge (select all which apply)? Electronic, Paper, SME	Electronic - Paper - SME	NSG DIMP plan, Appendix 1, lists each record and indicates if the record is electronic, paper, or an SME.	
7	192.1007(a)(3)				
		Does the plan contain written procedures to identify additional information that is needed to fill gaps due to missing, inaccurate, or incomplete records?	Yes or Satisfactory	The information is located in the NSG DIMP plan Sections 6.6 and 6.6a.	
8	192.1007(a)(3)				
		Does the plan list the additional information needed to fill gaps due to missing, inaccurate, or incomplete records?	Yes or Satisfactory	The information is located in the NSG DIMP plan Sections 6.6 and 6.6a.	
9	192.1007(a)(3)				
		Do the written procedures specify the means to collect the additional information needed to fill gaps due to missing, inaccurate, or incomplete records (e.g., O&M activities, field surveys, One-Call System, etc.)?	Yes or Satisfactory	The information is located in the NSG DIMP plan Sections 6.6 and 6.6a.	
10	192.1007(a)(5)				
		Do the written procedures require the capture and retention of data on any new pipeline installed?	Yes or Satisfactory	The information is located in NSG DIMP plan Section 6.7.	
11	192.1007(a)(5)				

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Does the data required for capture and retention include, at a minimum, the location where the new pipeline is installed and the material from which it is constructed?	No or Unsatisfactory	The information to be collected when installing new pipelines and associated fittings does not include the following items: material type, manufacturer, lot number, material specification, material grade, wall thickness, joining method and installation method.	Staff considered the unsatisfactory answer an Issue and NSG was notified of the missing information needed to meet the obligation of the requirement.
12	192.1007(a)				
		Does the documentation provided by the operator demonstrate implementation of the element “Knowledge of the System”?	Yes or Satisfactory	NSG uses SHRIMP, which contains the embedded procedures for determining the seven elements of a DIMP plan. Staff did discuss with various NSG personnel the records used to populate the overall DIMP plan.	While reviewing the SHRIMP plan, Staff did discover the data sources used did not indicate the form, record or document used to populate the results. Instead, the data source indicated the individual who provided the document. Staff is requesting a review of all data sources to capture the correct document name.
13	192.1007(a)				
		Has the operator demonstrated an understanding of its system?	Yes or Satisfactory	NSG has various distribution maps and records indicating the various pipeline facilities. In addition, NSG has a process in place to discover missing or inaccurate information. This process has captured missing or inaccurate information that was then entered into the NSG DIMP plan.	

Q. No.:	Rule Name:	Question	Answer	Details	Comments
14	192.1007(b)	In identifying threats, do the written procedures include consideration of the following categories of threats to each gas distribution pipeline?			
		Corrosion	Yes or Satisfactory	The information is located in the NSG DIMP plan in Section 7.0 a.	
		Natural Forces	Yes or Satisfactory	The information is located in the NSG DIMP plan in Section 7.0 b.	
		Excavation Damage	Yes or Satisfactory	The information is located in the NSG DIMP plan in Section 7.0 c.	
		Other Outside Force Damage	Yes or Satisfactory	The information is located in the NSG DIMP plan in Section 7.0 d.	
		Material or Welds	Yes or Satisfactory	The information is located in the NSG DIMP plan in Section 7.0 e.	
		Equipment Failure	Yes or Satisfactory	The information is located in the NSG DIMP plan in Section 7.0 f.	
		Incorrect Operation	Yes or Satisfactory	The information is located in the NSG DIMP plan in Section 7.0 g.	
		Other Concerns	Yes or Satisfactory	The information is located in the NSG DIMP plan in Section 7.0 h.	
15	192.1007(b)				
		Did the operator consider the information that was reasonably available to identify existing and potential threats?	Yes or Satisfactory	Staff reviewed the answers populated by the SHRIMP plan. When a threat was not included then a reasonable explanation was provided.	
16	Information Only				

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Does the plan subdivide the primary threats into subcategories to identify existing and potential threats?	Yes or Satisfactory	The primary threats were subdivided. An explanation was provided why the threat was subdivided in the SHRIMP plan Chapter 4.	
17	192.1007(b)				
		Incident and leak history	Yes or Satisfactory		
		Corrosion control records	Yes or Satisfactory		
		Continuing surveillance records	Yes or Satisfactory		
		Patrolling records	Yes or Satisfactory		
		Maintenance history	Yes or Satisfactory		
		Excavation damage experience	Yes or Satisfactory		
		Other – Describe	Yes or Satisfactory	Other incident reports and material specifications.	
		In identifying threats did the information considered include any of the following?	Yes or Satisfactory	Records to meet the following areas of concern were listed in the NSG DIMP plan Appendix 1.	
18	Information Only				
		Does the plan categorize primary threats as either “system-wide” or “localized”?	Some of Both	Although the plan does use some of both, most of the cases are system-wide.	Staff has requested that further reviews are used to validate the system-wide designation.
19	Information Only				
		Do the written procedures consider, in addition to the operator’s own information, data from external sources (e.g. trade associations, government agencies, or other system operators, etc.) to assist in identifying potential threats?	Yes or Satisfactory	The information is located in NSG DIMP plan Section 7.2. Contained in this section are various organizations who may provide information listing new or potential threats. The procedure does state these threats will be identified and implemented into the DIMP, if warranted.	Staff recommends adding to the procedure in Section 7.2 to state how the information from the various organizations will be transferred to the DIMP Engineer.

Q. No.:	Rule Name:	Question	Answer	Details	Comments
20	192.1007(b)				
		Does the documentation provided by the operator demonstrate implementation of the element “Identify Threats”?	No or Unsatisfactory	Staff reviewed Chapter 11.2 to determine if the answers used to populate SHRIMP were adequate. There were data sources used that were SME's instead of a record. Another case listed there were not any workmanship defects. Although NSG did not track workmanship defects when the DIMP plan was populated; workmanship defects do remain a threat and should be incorporated into the overall DIMP plan.	Staff issued a Notice of Amendment for failure to adequately identify all of the threats.
21	Information Only				
		Was the risk evaluation developed fully or in part using a commercially available tool?	Fully	SHRIMP	
		Commercial tool name if used:			
22	192.1007(c)				
		Do the written procedures contain the method used to determine the relative importance of each threat and estimate and rank the risks posed? Briefly describe the method.	Yes or Satisfactory	NSG uses SHRIMP. The Relative Risk Model is located in Chapter 11.3.2. In Section 8 of the NSG DIMP plan there is a risk model, but the plan states this model is currently not in use.	
23	192.1007(c)	Do the written procedures to evaluate and rank risk consider:			
		Each applicable current and potential threat?			
		Corrosion	Yes or Satisfactory	This information is located in SHRIMP Chapter 11.3.	

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Natural Forces	Yes or Satisfactory	This information is located in SHRIMP Chapter 11.3.	
		Excavation Damage	Yes or Satisfactory	This information is located in SHRIMP Chapter 11.3.	
		Other Outside Force Damage	Yes or Satisfactory	This information is located in SHRIMP Chapter 11.3.	
		Material or Welds	Yes or Satisfactory	This information is located in SHRIMP Chapter 11.3.	
		Equipment Failure	Yes or Satisfactory	This information is located in SHRIMP Chapter 11.3.	
		Incorrect Operation	Yes or Satisfactory	This information is located in SHRIMP Chapter 11.3.	
		Other Concerns	Yes or Satisfactory	This information is located in SHRIMP Chapter 11.3.	
24	192.1007(c)	Do the written procedures to evaluate and rank risk consider:			
		The likelihood of failure associated with each threat?			
		Corrosion	Yes or Satisfactory	This information is located in SHRIMP Chapter 11.3.	
		Natural Forces	Yes or Satisfactory	This information is located in SHRIMP Chapter 11.3.	
		Excavation Damage	Yes or Satisfactory	This information is located in SHRIMP Chapter 11.3.	
		Other Outside Force Damage	Yes or Satisfactory	This information is located in SHRIMP Chapter 11.3.	
		Material or Welds	Yes or Satisfactory	This information is located in SHRIMP Chapter 11.3.	
		Equipment Failure	Yes or Satisfactory	This information is located in SHRIMP Chapter 11.3.	
		Incorrect Operation	Yes or Satisfactory	This information is located in SHRIMP Chapter 11.3.	

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Other Concerns	Yes or Satisfactory	This information is located in SHRIMP Chapter 11.3.	
25	192.1007(c)	Do the written procedures to evaluate and rank risk consider: The potential consequence of such a failure?			
		Corrosion	Yes or Satisfactory	This information is located in SHRIMP Chapter 11.3.	
		Natural Forces	Yes or Satisfactory	This information is located in SHRIMP Chapter 11.3.	
		Excavation Damage	Yes or Satisfactory	This information is located in SHRIMP Chapter 11.3.	
		Other Outside Force Damage	Yes or Satisfactory	This information is located in SHRIMP Chapter 11.3.	
		Material or Welds	Yes or Satisfactory	This information is located in SHRIMP Chapter 11.3.	
		Equipment Failure	Yes or Satisfactory	This information is located in SHRIMP Chapter 11.3.	
		Incorrect Operation	Yes or Satisfactory	This information is located in SHRIMP Chapter 11.3.	
		Other Concerns	Yes or Satisfactory	This information is located in SHRIMP Chapter 11.3.	
26	192.1007(c)				
		If subdivision of system occurs, does the plan subdivide the system into regions with similar characteristics and for which similar actions are likely to be effective in reducing risk? Briefly describe the approach.	Yes or Satisfactory	SHRIMP does ask the operator if the threat is uniform throughout the system, is localized, or located inside or outside a business district.	
27	Information Only				

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Is the method used to evaluate and rank risks reasonable?	Yes or Satisfactory	NSG uses SHRIMP. Staff reviewed Chapter 11.3.2, Relative Risk Model, which contains the method to evaluate and rank risks.	
28	192.1007(c)				
		Are the results of the risk ranking supported by the risk evaluation model/method?	Yes or Satisfactory	Staff reviewed the risk ranking and compared the weighting factors to the Relative Risk Model.	
29	192.1007(c)				
		Did the operator validate the results generated by the risk evaluation model/method? Briefly describe.	No or Unsatisfactory	The risk ranking does not properly rank the various threats in NSG's system.	An NOA will be issued. NSG must better define the process used to validate the rankings. Furthermore, NSG must detail why a ranking was changed.
30	192.1007(c)				
		Does the documentation provided by the operator demonstrate implementation of the element “Evaluate and Rank Risk”?	No or Unsatisfactory	Staff reviewed various threats and determined multiple threats were used for the same threat. The overall review of threats by SME's was not adequate.	Staff has issued an NOA previously regarding the items discussed in the Answer Details.
31	192.1007 (d)				
		Does the plan include procedures to identify when measures, beyond minimum code requirements specified outside of Part 192 Subpart P, are required to reduce risk?	Yes or Satisfactory	The information is located in NSG DIMP plan Section 9.2.	
32	192.1007 (d)				
		When measures, beyond minimum code requirements specified outside of Part 192 Subpart P, are required to reduce risk, does the plan identify the measures selected, how they will be implemented, and the risks they are addressing?	Yes or Satisfactory	Appendix 2 of the NSG DIMP plan contains the threats, sub threats, and the additional actions for each sub threat.	Staff has requested that NSG tie the additional actions to each threat.
34	192.1007 (d)				

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Locate the leaks in the distribution system;	Yes or Satisfactory	Section 9.3 a) in the NSG DIMP plan references various procedures in the NSG O&M. General Order 2.020 (Exhibit IX Distribution Manual) contains the procedures for reporting, classifying, rechecking, repairing and clearing of outside natural gas leaks.	
		Evaluate the actual or potential hazards associated with these leaks;	Yes or Satisfactory	NSG DIMP plan Section 9.3 b) references procedures in the NSG O&M General Order 2.020 for distribution personnel and Section 11 for field service personnel.	
		Act appropriately to mitigate these hazards;	Yes or Satisfactory	NSG DIMP plan Section 9.3 c) references procedures in the NSG O&M General Order 2.020.	
		Keep records;	Yes or Satisfactory	NSG DIMP plan Section 9.3 d) states each leak ticket is tied to a leak address. These leak records are maintained and may be either paper or electronic.	
		Self-assess to determine if additional actions are necessary to keep people and property safe.	Yes or Satisfactory	Leak program Supervisors routinely review leak survey, classification and repair results to ensure that all leaks discovered receive proper response.	
		Does the plan include an effective leak management program (unless all leaks are repaired when found)	Yes or Satisfactory		

Q. No.:	Rule Name:	Question	Answer	Details	Comments
35	192.1007 (d)				
		Does the documentation provided by the operator demonstrate implementation of the measures, required by Part 192 Subpart P, to reduce risk?	Yes or Satisfactory	Staff reviewed various Additional Actions listed in Appendix 2 of the NSG DIMP plan.	
36	192.1007 (e)	Does the plan contain written procedures for how the operator established a baseline for each performance measure?			
		i) Number of hazardous leaks either eliminated or repaired, categorized by cause?	Yes or Satisfactory	The information is located in NSG DIMP plan Section 10.2.	
		ii) Number of excavation damages?	Yes or Satisfactory	The information is located in NSG DIMP plan Section 10.2.	
		iii) Number of excavation tickets received by gas department?	Yes or Satisfactory	The information is located in NSG DIMP plan Section 10.2.	
		iv) Total number of leaks either eliminated or repaired categorized by cause?	Yes or Satisfactory	The information is located in NSG DIMP plan Section 10.2.	
		v) Number of hazardous leaks either eliminated or repaired, categorized by material?	Yes or Satisfactory	The information is located in NSG DIMP plan Section 10.2.	
		vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the IM program in controlling each identified threat?	Yes or Satisfactory	The information is located in NSG DIMP plan Section 10.2.	
37	192.1007 (e)	Does the plan establish a baseline for each performance measure?			
		i) Number of hazardous leaks either eliminated or repaired, categorized by cause?	Yes or Satisfactory	The baseline for the performance measure is located in Appendix 3 of the NSG DIMP plan.	
		ii) Number of excavation damages?	Yes or Satisfactory	The baseline for the performance measure is located in Appendix 3 of the NSG DIMP plan.	

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		iii) Number of excavation tickets received by gas department?	Yes or Satisfactory	The baseline for the performance measure is located in Appendix 3 of the NSG DIMP plan.	
		iv) Total number of leaks either eliminated or repaired categorized by cause?	Yes or Satisfactory	The baseline for the performance measure is located in Appendix 3 of the NSG DIMP plan.	
		v) Number of hazardous leaks either eliminated or repaired, categorized by material?	Yes or Satisfactory	The baseline for the performance measure is located in Appendix 3 of the NSG DIMP plan.	
		vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the IM program in controlling each identified threat?	Yes or Satisfactory	The baseline for the performance measure is located in Appendix 3 of the NSG DIMP plan.	
38	192.1007 (e)	Does the operator have written procedures to collect the data for each performance measure?			
		i) Number of hazardous leaks either eliminated or repaired, categorized by cause?	Yes or Satisfactory	The information is located in NSG DIMP plan Section 10.2.	
		ii) Number of excavation damages?	Yes or Satisfactory	The information is located in NSG DIMP plan Section 10.2.	
		iii) Number of excavation tickets received by gas department?	Yes or Satisfactory	The information is located in NSG DIMP plan Section 10.2.	
		iv) Total number of leaks either eliminated or repaired categorized by cause?	Yes or Satisfactory	The information is located in NSG DIMP plan Section 10.2.	
		v) Number of hazardous leaks either eliminated or repaired, categorized by material?	Yes or Satisfactory	The information is located in NSG DIMP plan Section 10.2.	
		vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the IM program in controlling each identified threat?	Yes or Satisfactory	The information is located in NSG DIMP plan Section 10.2.	

Q. No.:	Rule Name:	Question	Answer	Details	Comments
39	192.1007 (e)	Do the written procedures require the operator to monitor each performance measure?			
		i) Number of hazardous leaks either eliminated or repaired, categorized by cause?	Yes or Satisfactory	The information is located in NSG DIMP plan Section 10.3.	
		ii) Number of excavation damages?	Yes or Satisfactory	The information is located in NSG DIMP plan Section 10.3.	
		iii) Number of excavation tickets received by gas department?	Yes or Satisfactory	The information is located in NSG DIMP plan Section 10.3.	
		iv) Total number of leaks either eliminated or repaired categorized by cause?	Yes or Satisfactory	The information is located in NSG DIMP plan Section 10.3.	
		v) Number of hazardous leaks either eliminated or repaired, categorized by material?	Yes or Satisfactory	The information is located in NSG DIMP plan Section 10.3.	
		vi) Any additional measures the operator determines are needed to evaluate the effectiveness of the IM program in controlling each identified threat?	Yes or Satisfactory	The information is located in NSG DIMP plan Section 10.3.	
40	192.1007 (e)				
		When measures are required to reduce risk, do the written procedures provide how their effectiveness will be measured?	Yes or Satisfactory	The information is located in NSG DIMP plan Section 10.3.	
41	Information Only				
		Can the performance measures identified by the operator in the plan be counted, monitored, and supported?	Yes or Satisfactory		
42	192.1007 (e)				
		Does the documentation provided by the operator demonstrate implementation of the element “Measure Performance, Monitor Results, and Evaluate Effectiveness”?	Yes or Satisfactory		
43	192.1007 (f)	Do the written procedures for periodic review include:			

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		a. Staff requests NSG to uses the complexity of the system and changes in factors affecting the risk of failure, not to exceed 5 years?	Frequency of review based on Unsatisfactory	the 5 year maximum for a review. Staff is requesting that NSG review this policy and write a justification why 5 years should be allowed considering the complexity of their system.	No or Currently, NSG justify the 5 year time frame for reevaluation due to the complexity of the system.
		b. Verification of general information (e.g. contact information, form names, action schedules, etc.)?	Yes or Satisfactory	The information is located in NSG DIMP plan Section 11.0.	
		c. Incorporate new system information?	Yes or Satisfactory	The information is located in NSG DIMP plan Section 11.0.	
		d. Re-evaluation of threats and risk?	Yes or Satisfactory	The information is located in NSG DIMP plan Section 11.0.	
		e. Review the frequency of the measures to reduce risk?	Yes or Satisfactory	The information is located in NSG DIMP plan Section 11.0.	
		f. Review the effectiveness of the measures to reduce risk?	Yes or Satisfactory	The information is located in NSG DIMP plan Section 11.0.	
		g. Modify the measures to reduce risk and refine/improve as needed (i.e. add new, modify existing, or eliminate if no longer needed)?	Yes or Satisfactory	The information is located in NSG DIMP plan Section 11.0.	
		h. Review performance measures, their effectiveness, and if they are not appropriate, refine/improve them?	Yes or Satisfactory	The information is located in NSG DIMP plan Section 11.0.	
44	Information Only				

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Does the plan contain a process for informing the appropriate operating personnel of an update to the plan?	Yes or Satisfactory	The information is located in the NSG DIMP plan Section 11.2.	The process stated updates to the plan may be made through verbal, electronic or paper communications. Staff has requested that some type of record be maintained to document the updates have been disseminated to the appropriate personnel.
45	Information Only				
		Does the plan contain a process for informing the appropriate regulatory agency of a significant update to the plan?	Yes or Satisfactory	The information is located in NSG DIMP plan Section 11.2.	
46	192.1007 (f)				
		Does the documentation provided by the operator demonstrate implementation of the element “Periodic Evaluation and Improvement”?	Yes or Satisfactory		
47	192.1007 (g)				
		Does the plan contain or reference procedures for reporting, on an annual basis, the four measures listed in 192.1007(e)(1)(i) through (e)(1)(iv) to PHMSA as part of the annual report required by § 191.11 and the State regulatory authority?	Yes or Satisfactory	The information is located in NSG DIMP plan Section 12.0.	
48	Information Only				
		When required by the State, does the plan identify the specific report form, date, and location where it is to be submitted?	Yes or Satisfactory	The information is located in NSG DIMP plan Section 12.0.	
49	192.1007 (g)				
		Has the operator submitted the required reports?	Yes or Satisfactory		
50	192.1009				
		Does the operator have written procedures to collect the information necessary to comply with the reporting requirements of 192.1009?	Yes or Satisfactory	The information is located in NSG DIMP plan Section 13.0.	
51	192.1011				

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Does the operator have written procedures specifying which records demonstrating compliance with Subpart P will be maintained for at least 10 years?	Yes or Satisfactory	The information is located in NSG DIMP plan Section 14.0.	
52	192.1011				
		Does the operator have written procedures specifying that copies of superseded integrity management plans will be maintained for at least 10 years?	Yes or Satisfactory	The information is located in NSG DIMP plan Section 14.0.	
53	192.1011				
		Has the operator maintained the required records?	Yes or Satisfactory		Staff did not verify that all records have been maintained, but a discussion was held with NSG personnel confirming these records are maintained for the required period of time.
54-1	192.1007 (d)	1. For the top five highest ranked risks from the operator's risk ranking list the following:			
		Primary threat category (corrosion, natural forces, excavation damage, other outside force damage, material or weld, equipment failure, incorrect operation, and other concerns);	Excavation damage		
		Threat subcategory (GPTC threat subcategories are acceptable. Try to be specific. Example, failing bonnet bolts of gate valve, manufacturer name, model #);	Third party		
		Measure to reduce the risk (list the one measure the operator feels is most important to reducing the risk);		Inspect targeted excavation and backfill activities	
		Associated performance measure.		Track number of damages per 1000 locates	
54-2	192.1007 (d)	2. For the top five highest ranked risks from the operator's risk ranking list the following:			
		Primary threat category (corrosion, natural forces, excavation damage, other outside force damage, material or weld, equipment failure, incorrect operation, and other concerns);	Other outside force damage		

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Threat subcategory (GPTC threat subcategories are acceptable. Try to be specific. Example, failing bonnet bolts of gate valve, manufacturer name, model #);	Vehicular Damages		
		Measure to reduce the risk (list the one measure the operator feels is most important to reducing the risk);		Meters and regulators shall not be installed in locations where damage may occur without installation of a barrier.	
		Associated performance measure.		Track the number of damages.	
54-3	192.1007 (d)	3. For the top five highest ranked risks from the operator's risk ranking list the following:			
		Primary threat category (corrosion, natural forces, excavation damage, other outside force damage, material or weld, equipment failure, incorrect operation, and other concerns);	Natural forces		
		Threat subcategory (GPTC threat subcategories are acceptable. Try to be specific. Example, failing bonnet bolts of gate valve, manufacturer name, model #);	Frost heave		
		Measure to reduce the risk (list the one measure the operator feels is most important to reducing the risk);		Remove susceptible material and replace with PE	
		Associated performance measure.		Track the number of failures per 1000 services and miles of main.	
54-4	192.1007 (d)	4. For the top five highest ranked risks from the operator's risk ranking list the following:			
		Primary threat category (corrosion, natural forces, excavation damage, other outside force damage, material or weld, equipment failure, incorrect operation, and other concerns);	Corrosion		
		Threat subcategory (GPTC threat subcategories are acceptable. Try to be specific. Example, failing bonnet bolts of gate valve, manufacturer name, model #);	Atmospheric		

Q. No.:	Rule Name:	Question	Answer	Details	Comments
		Measure to reduce the risk (list the one measure the operator feels is most important to reducing the risk);		Coat or paint the exposed piping when mild surface corrosion appears.	
		Associated performance measure.		Track the number of failures per 1000 services	
54-5	192.1007 (d)	5. For the top five highest ranked risks from the operator's risk ranking list the following:			
		Primary threat category (corrosion, natural forces, excavation damage, other outside force damage, material or weld, equipment failure, incorrect operation, and other concerns);	Material or weld or joint failure		
		Threat subcategory (GPTC threat subcategories are acceptable. Try to be specific. Example, failing bonnet bolts of gate valve, manufacturer name, model #);	Other	Swing joints located on the service at the riser below grade.	
		Measure to reduce the risk (list the one measure the operator feels is most important to reducing the risk);		Replace the swing joints when leaking.	
		Associated performance measure.		Track the number of leaks per 1000 services.	